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Presentment Date: March 14, 2011 Time: 12:00 (noon) (Eastern)

Objections Due: March 11, 2001 Time: 12:00 (noon) (Eastern)

Former Counsel to individual Debtor, Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff, v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation (Substantively

Consolidated)

NOTICE OF PRESENTMENT OF ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR

PLEASE TAKE NOTICE that upon the annexed motion of Dickstein Shapiro LLP, the undersigned will present the attached proposed order to the Honorable Burton R. Lifland, United States Bankruptcy Judge, for signature on Monday, March 14, 2011 at 12:00 noon.

PLEASE TAKE FURTHER NOTICE that unless a written a objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, along with counsel to the SIPC Trustee, Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, NY 10111, Attn: Marc E. Hirschfeld, and a

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courtesy copy is delivered to the Bankruptcy Judge's chambers, on or before March 11, 2011 at 12:00 noon, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed and served, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend such a hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: March 7, 2011

Respectfully submitted,

/s/ Brian E. Goldberg

Brian E. Goldberg

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Former Counsel to individual Debtor

NOTICE TO: 1) UNITED STATES TRUSTEE

2) COUNSEL TO SIPC TRUSTEE

3) ALL PARTIES ON MASTER SERVICE LIST AND/OR REQUESTING

NOTICE IN THE ABOVE-CAPTIONED CASE